

December 17, 2009

Via E-mail and Certified Mail No. 7003 3110 0004 5475 8109
Ms. Madonna Narvaez
U.S. EPA Region 10
1200 Sixth Avenue
Mail Code: AWT-107
Seattle, WA 98101
narvaez.madonna@epa.gov

Re: 40 CFR Part 63, Subpart SSSSSS ("Glass NESHAP") Compliance

Saint-Gobain Containers, Inc. ("SGCI")

Seattle, Washington

Dear Ms. Narvaez:

With this letter, SGCI timely provides and/or confirms its Notification of Compliance Status with the Glass NESHAP for Seattle Furnaces #2, #3, and #4 pursuant to 40 CFR § 63.9(h) and § 63.11456(b). Specifically, this notification addresses each of the elements of 40 CFR § 63.9(h)(2)(i) as follows:

- A. Stack testing for Furnace #2 on June 10, for Furnace #3 on June 9, and Furnace #4 on August 4, 2009, provides the method used to determine compliance.
- B. The results of the stack testing for Furnaces #2, #3, and #4 are addressed in the stack test reports previously provided on August 6 and September 23, 2009.
- C. Pursuant to 40 CFR § 63.11455(e), the affected furnaces will "demonstrate continuous compliance by satisfying the applicable recordkeeping requirements specified in § 63.11457."
- D. As specified by 40 CFR § 63.11452(b), SGCI conducted Method 29 stack testing for chromium because it constitutes a "glass manufacturing metal HAP" added as a "raw material." The result of the respective stack tests were a 3-hour block average production-based metal HAP emission rate of 0.0041, 0.0018, and 0.004 lb/ton for Furnaces #2, #3, and #4, respectively. Each result is well below the applicable 0.02 lb/ton emission limit from the Glass NESHAP, Table 1, § 1(b).

- E. Not applicable.
- F. Not applicable.
- G. Please see the certification of accuracy and compliance status below.

By copy of this letter, SGCI provides its Title V permitting agency (Puget Sound Clean Air Agency) with confirmation that the Glass NESHAP applies to the above-mentioned facility and will need to be added to SGCI's Title V permit for certain furnaces.

As noted in SGCI's August 6, 2009 letter to you, Seattle Furnace #5 is not an affected furnace under the Glass NESHAP. In addition, the August 6 letter formally withdrew a February 17, 2009 Amended Notification that was submitted with the belief that nickel would be used as a raw material at Furnace #4. As SGCI explained, however, nickel was not added as a raw material at Furnace #4. Thus, chromium remains the only Glass Manufacturing Metal HAP added as a raw material at Furnace #2, #3, and #4.

By signing this letter, I certify that I am the responsible official for the above-mentioned facility and, based on information and belief formed after reasonable inquiry, that (1) the information in this notification is accurate and (2) the above-mentioned facility has complied with the applicable requirements of the Glass NESHAP.

If you have any questions or require additional information, please contact Ms. Jayne Browning at 765-741-7112.

Sincerely,

Douglas Coburn

Plant Manager, Seattle Plant Saint-Gobain Containers, Inc.

c: Gerry Pade, PSCAA
Jayne Browning
Marlon Trigg
Tristan Thommasson
Jim Moretti
Valerie Krulic
Kurt Kissling
Ty Sibbit